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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON

UNITED STATES OF AMERICA,

Misc. No. 6:21-mc-754

Plaintiff,

v.

**IN THE MATTER OF \$101,013.00 IN
U.S. CURRENCY,
in rem,**

**UNOPPOSED MOTION TO
EXTEND 90-DAY PERIOD
PURSUANT TO
18 U.S.C. § 983(a)(3)(A)**

Defendant.

Pursuant to Local Rule 7-1, counsel for the United States certifies that I have contacted Jay W. Frank, attorney for Claimant Aidan Malik Bailey who concurs with this extension.

On April 12, 2021, Aidan Malik Bailey filed a claim in a non-judicial civil forfeiture proceeding by the Drug Enforcement Administration to \$101,013 in U.S. currency seized from him on or about January 22, 2021.

No other person filed a claim in the administrative forfeiture proceeding.

As provided in 18 U.S.C. § 983(a)(3)(A), the United States and Aidan Malik Bailey agree to extend the time in which the United States will file a Complaint for Forfeiture against the \$101,013 in U.S. Currency or to obtain an Indictment alleging that the \$101,013 in U.S. Currency

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is subject to forfeiture. Aidan Malik Bailey agrees that the deadline by which the United States shall be required to file a Complaint for Forfeiture against the property and/or to obtain an Indictment alleging that the property is subject to forfeiture shall be extended to October 9, 2021.

Aidan Malik Bailey agrees that until the United States files a Complaint for Forfeiture against the \$101,013 in U.S. Currency and/or obtains an Indictment alleging that the \$101,013 in U.S. Currency is subject to forfeiture, or until October 9, 2021, or until the parties reach a settlement regarding the property, whichever occurs first, the property shall remain in the custody of the United States, and Aidan Malik Bailey shall not seek its return for any reason in any manner.

Respectfully submitted this 1st day of July, 2021.

SCOTT E. ASPHAUG
Acting United States Attorney

/s/ Christopher Cardani
CHRISTOPHER CARDANI
Assistant United States Attorney

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have made service of the foregoing MOTION TO EXTEND 90-DAY PERIOD and a proposed ORDER on the party herein by causing to be deposited in the United States mail at Portland, Oregon, on July 1, 2021, true copies thereof in an envelope with postage thereon prepaid, addressed to:

Jay W. Frank
Moule & Frank
259 East 5th Ave.
Eugene, OR 97401

Attorney for Defendant Aidan Malik Bailey

/s/ Lea Achim
LEA ACHIM
Paralegal